

Timothy Elder (Cal. Bar No. 277152)
Kristopher A. Nelson (Cal. Bar No. 342552)
TRE LEGAL PRACTICE
1155 Market Street, Tenth Floor
San Francisco, CA 94103
(415) 873-9199
(415) 952-9898 fax
telder@trelegal.com, knelson@trelegal.com

S. Tomiyo Stoner (Cal. Bar No. 289246)
UNDAUNTED LAW FIRM, P.C.
600 California St., Floor 7
San Francisco, CA 94108
(214) 415-7340
tstoner@undauntedlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,
Plaintiff,
v.
COUNTY OF ALAMEDA,
Defendant

Case No. 3:20-cv-06570-TSH

**DECLARATION OF TIMOTHY
ELDER IN SUPPORT OF
OPPOSITION TO RENEWED
MOTION FOR JUDGMENT AS A
MATTER OF LAW OR, IN THE
ALTERNATIVE, FOR NEW TRIAL**

DECLARATION OF TIMOTHY ELDER

I, Timothy Elder, declare:

I. I am an attorney admitted to practice in California and a counsel of record for Plaintiff Lisamaria Martinez. This declaration is based on my personal knowledge. I am competent to testify on the matters stated and declare that these items are true and accurate to the best of my knowledge and belief.

2. Attached as **Exhibit A** is a true and correct copy of relevant excerpts of Trial Transcript, Volume 3, Testimony of Matt Yankee.

3. Attached as **Exhibit B** is a true and correct copy of relevant excerpts of Trial Transcript, Volume 4, Testimony of Lisamaria Martinez.

4. Attached as **Exhibit C** is a true and correct copy of Exhibit 4C admitted into evidence at trial, an audio recording of Plaintiff's first interaction with Laura Briones on the day of the incident.

5. Attached as **Exhibit D** is a true and correct copy of relevant excerpts of Trial Transcript, Volume 3, Testimony of Steven Clark.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 10, 2025

/s/ Timothy Elder
Timothy Elder